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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: OSCAR D. TERAN, Debtor

Bankruptcy No. 10-31718 DM
Chapter 7

OSCAR D. TERAN, on behalf of himself and
all those similarly situated,

Adversary No. 20-03075

Plaintiffs,

v.

NAVIENT SOLUTIONS, LLC, NAVIENT
CREDIT FINANCE CORPORATION,

Defendants.

**RESPONSE OF STEPHANIE
MAZLOOM AND ROBERT AND
MOLLY CRANDALL TO PLAINTIFF'S
STATEMENT OF RECENT
DEVELOPMENT IN SUPPORT OF
PLAINTIFF'S MOTION FOR CLASS
CERTIFICATION (ECF NO. 122)**

Hon. Dennis Montali

Adversary No. 20-03075

RESPONSE OF STEPHANIE MAZLOOM AND ROBERT AND MOLLY CRANDALL TO PLAINTIFF'S
STATEMENT OF RECENT DEVELOPMENT IN SUPPORT OF PLAINTIFF'S MOTION FOR CLASS

1 On March 14, 2023, Plaintiff filed a notice with the Court, noting the recent decision of the
2 Bankruptcy Court for the District of Nebraska in *Woodard v. Navient Solutions, LLC*, Adv. No.
3 21-8023-TLS (Mar. 8, 2023), in which the bankruptcy court certified a class of individuals with
4 private loans to Navient, covering the Eighth Circuit. Plaintiff suggests that the relief that was
5 provided in *Woodard* is “similar to the class of consumers at issue in Mr. Teran’s motion for class
6 certification.” Dkt. No. 122 at 2. However, there is a substantial difference between the two
7 classes. In *Woodard*, brought by the undersigned counsel, the requested relief includes both
8 monetary and injunctive relief for the entire class, without any of the claim splitting that is at issue
9 here. In this case, unlike *Woodard*, Plaintiff seeks a national injunctive class with no monetary
10 relief.

12 The undersigned also wishes to advise the Court that, in a hearing held on February 28,
13 2023, in *Mazloom v. Navient Solutions, LLC*, Adv. Pro. No. 20-80033 (Bankr. N.D.N.Y.), the
14 bankruptcy court granted the motion of Robert and Molly Crandall to intervene as plaintiffs and
15 class representatives, and the undersigned anticipates that a motion seeking certification of a
16 national monetary and injunctive class will be filed soon after the order on intervention is entered.
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3 Dated: March 16, 2023
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Respectfully submitted,

BOIES SCHILLER FLEXNER LLP

By: /s/ Sean P. Rodriguez

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